

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

SHARON LEA MANNING WAID,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 2:06-cv-00171-MEF
)	
REJEANA V. FREEMAN, et al.)	
)	
Defendants.)	

**UNITED STATES' MOTION FOR ENLARGEMENT OF TIME TO FILE REPLY
BRIEF IN SUPPORT OF ITS MOTION TO DISMISS**

COMES NOW Defendant the United States, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama and, pursuant to Rule 6 (b)(1) of the Federal Rules of Civil Procedure, moves this Court to enlarge the time for it to file a reply brief in support of its motion to dismiss from April 19, 2006, to April 27, 2006. In support of this motion, the United States advances the following grounds:

1. By Order dated March 28, 2006, this Court established April 19, 2006, as the deadline for the United States to file a reply brief in support of its motion to dismiss.
2. In response to the United States' motion to dismiss, on April 11, 2006, plaintiff filed an "answer and objection to United States' Motion to dismiss," a brief and documents in support thereof, and a Motion to Remand to State court.¹
3. By Order dated April 12, 2006, this Court established April 27, 2006, as the

¹Plaintiff also filed a motion for clarification and objection to the motion to dismiss in State Court on April 7, 2006.

deadline for the United States to respond to plaintiff's motion to remand.

4. For sake of clarity and to avoid duplication of arguments, the United States would like to respond to plaintiff's opposition to its motion to dismiss and plaintiff's motion to remand in a single brief. The United States proposes that this brief be filed on April 27, 2006, the current due date for its response to the motion to remand.

5. Plaintiff's attorney, Tom Payne, Esq., has no objection to the requested enlargement of time.

WHEREFORE, pursuant to Rule 6 (b)(1) and for good cause shown, the United States moves that the deadline for filing a reply brief in support of its motion to dismiss be enlarged to April 27, 2006.

Respectfully submitted this 18th day of April, 2006.

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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to plaintiff's attorney, Tom Payne, Esquire, and I hereby certify that I have mailed, by United States Postal Service, a copy of same to the following non-CM/ECF participant(s):

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s/Stephen M. Doyle
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